Minimum Compliance in Local Policy Implementation in Contemporary China: The Case of Municipal Solid Waste Management

Victoria S. Zhou 🔟 and Gunter Schubert

Faculty of Humanities, Department of Chinese Studies, University of Tübingen, Tübingen, Germany
Corresponding author: Gunter Schubert; Email: gunter.schubert@uni-tuebingen.de

Abstract

Environmental governance, often characterized as a tug-of-war between central ambitions and local reluctance, provides a valuable lens for examining the dynamics of China's central–local relations and their impact on policy processes, enhancing our understanding of both the changes and continuities of the Xi Jinping era. By analysing the eco-transformation of waste management through the framework of political steering theory, this article presents a nuanced avoidance strategy used by local governments, which we term minimum compliance. This strategy allows local authorities to cope with and sidestep centrally mandated policies while avoiding the consequences of policy failure. This study enriches the discourse on China's central–local relations by exploring why top-level design has not reduced policy implementation deviations. It also highlights how local governments in the Xi era evade policy responsibilities in their daily operations and hedge against political pressure.

摘要

环境治理历来是中央政策意图与地方执行意愿博弈的典型领域, 因此成为观察中国中央 – 地方关系及其对政策过程影响的重要切口。借助这一视角, 我们得以更深入理解习近平时代的延续与变革。本文以政治引导理论为分析框架, 聚焦废弃物治理的生态转型, 提出 "最低合规"这一地方政府在高压政策环境中常用的策略性回避机制。该策略使地方政府在面对中央强制性政策时, 既能形式上作出响应, 又能实质上规避执行责任, 从而避免因政策失败而承受政治后果。通过这一案例, 本文进一步探讨为何"顶层设计"在实践中未能有效减少政策执行的偏差, 并揭示在高压政治环境下, 地方政府如何于日常治理中规避责任、对冲风险, 从而深化我们对习近平时代中央 – 地方关系运作逻辑的理解。

Keywords: environmental policy; political steering theory; policy process; local governance; central–local relations
关键词: 环境政策; 政治引导理论; 政策过程; 地方治理; 中央地方关系

As Xi Jinping 习近平 embarks upon his third term in office, top-level design has become the "new normal" in China's policy process, recalibrating central–local relations to address persistent systemic pitfalls in local policy implementation across various sectors. Central authority has been further consolidated, while local governments' room for manoeuvre has increasingly been constrained. However, longstanding issues that characterized the Jiang Zemin 江泽民 and Hu Jintao 胡锦涛 eras – such as policy evasion, shirking and distortion – persist, raising critical questions about how local governments are adapting to intensifying top-down pressure. Nowhere is this tension more pronounced than in environmental governance, where conflicting central and local interests often

result in policy outcomes that fall short of expectations. This study examines the eco-management of municipal solid waste (MSW), focusing specifically on the mandatory waste separation system as a prerequisite for enhancing the sustainability of MSW treatment, reducing environmental impact and improving energy efficiency. This case study assesses whether top-level design has improved environmental governance and can fulfil the ambitious official rhetoric of "ecological civilization." As a policy personally championed by Xi as a "hallmark of social civilization" (*shehui wenming shuiping de zhongyao tixian* 社会文明水平的重要体现), the management of MSW is particularly relevant to questions of top-level design.

The data for this study were gathered through document analysis, field verification and interviews conducted between June 2017 and March 2023. Documents included government-issued policy plans, regulations, meeting minutes and performance evaluations, which were used to identify key steering patterns in policy implementation. Fieldwork in cities T and N validated the reliability of official data and provided insights into practices on the ground. Both cities have significant economic and political importance and have served as pilot sites for the eco-transformation of MSW management since the 2000s and in recent initiatives launched after 2017. The data on City T were primarily derived from government policies, with interviews conducted mainly with grassroots officials and relevant district-level departments, in particular the bureau of urban administration and law enforcement (BUALE) and the bureau of ecology and environment (BEE), as well as these offices at the prefecture level.[1] City N serves as a comparative case, again concentrating on the grassroots and district levels, but with a greater focus on collaboration with social actors. We conducted 81 semi-structured interviews with individuals and groups: 35 with interviewees from the governmental and public sectors and 46 from private enterprises, community organizations and local environmental non-governmental organizations (ENGOs).[2] Findings were triangulated through document analysis, field observations and repeated interviews with key participants to ensure consistency and to track long-term policy dynamics.

Empirical analysis of these data draws on the analytical toolkit of political steering theory. The policy implementation of MSW eco-management is simultaneously shaped by vertical accountability – from central mandates to local governments – and horizontal administrative fragmentation, particularly in the coordination between sanitation, ecology and urban management departments. Political steering theory provides a particularly appropriate framework for analysing these multi-directional dynamics, especially through its distinction between steering subjects and objects. Steering subjects – typically the central government and mid- to high-level local authorities – pursue different modes of steering, including hard steering, negotiation, competition and soft steering.[3] In the case of MSW eco-management, particular attention is paid to the shift from a soft-steering mode (i.e. discursive guidance) to a hard-steering mode, wherein authoritative decision making is applied through command-and-control practices, especially mandated policy tasks that are subject to strict evaluation and regular inspection by higher authorities. Correspondingly, steering objects – primarily lower-level local governments – exhibit different forms of governability, which refers to their responsiveness to top-down directives and highlights their capacity to deploy avoidance strategies (for example, coping or shirking) and counter-steering behaviour in response to political pressure from above.[4] By examining the Chinese state's steering capacity and the resulting governability of steering

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1 The BUALE is the primary department responsible for MSW management, including collection, transportation and treatment, while the BEE is tasked with supervising the environmental impact during the transportation and treatment stages.

2 For detailed fieldwork data, see online supplementary material: "Supplementary information on field survey.pdf" in China's Municipal Solid Waste Eco-Management Policy Tracking (2017–2023), *Zenodo*, https://doi.org/10.5281/zenodo.14757846.

3 Schubert and Alpermann 2019, 212.

4 Ibid., 211.

objects, MSW eco-management serves as a case study to assess the effectiveness of environmental policymaking under top-level design in terms of its implementation effectiveness, which refers to "the steering subject's capacity to produce an outcome which is in accordance with the state's pre-determined objectives and enjoys sufficient political legitimacy to avoid coping, shirking or counter-steering on the part of steering objects."[5]

Our study suggests that intensified policy steering under top-level design, which is characterized by a transformation from a soft to a hard-steering mode, does not guarantee effective implementation in environmental governance or output efficiency.[6] Rather, it often results in minimum compliance, a specific avoidance strategy employed by local governments to minimize political effort while adapting to increased hierarchical pressure. Unlike other avoidance strategies used by local governments, such as shirking or counter-steering,[7] minimal compliance involves implementing higher-level policies to a certain degree merely to give the appearance of compliance, while actually adhering to established policy choices. Moreover, our study highlights a shift in local officials' decision making from benefit maximization to risk aversion. In doing so, it makes a valuable contribution by introducing the concept of minimal compliance in local policy implementation and enriching the literature on evolving central–local relations and the specificities of the Chinese policy process in the Xi era.

The article is structured as follows. The next section reviews the recent literature on the link between central–local relations and environmental governance in China. The empirical analysis begins with an examination of the central leadership as a governance subject and the transformation of its governance modes under Xi. At the local level, the analyses distinguish between two levels of government in policy implementation. Prefectural authorities are responsible for planning, mobilization and coordination within their jurisdictions, while grassroots authorities (including district/county and subdistrict/township governments) carry out actual implementation on the ground. For its part, the prefecture level acts both as a steering object (of the centre) and as a steering subject in mobilizing lower-level governments, while grassroots governments are considered only as steering objects, with a particular focus on their governability. Building on the empirical findings, we then introduce the concept of minimal compliance and interpret it through the case of MSW eco-management. The concluding section briefly summarizes our main findings.

Recalibrated Central–Local Relations and Environmental Policy Steering

Since the reform era, China's central–local relations have been described as a combination of political centralization and governance decentralization,[8] as reflected in the country's authoritarian but fragmented bureaucratic structure and de facto federalism in fiscal arrangements.[9] Central control and local discretion have symbiotically underpinned China's governance. Local agendas align with central directives while allowing room for adaptation, and central policies incorporate feedback from local administrations.[10] The central government has typically steered policy delivery through the performance evaluation system[11] and fiscal instruments,[12] imposing additional top-down interventions, when deemed necessary, via vertical administrative control[13] and political campaigns.[14] In parallel,

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5 Ibid., 208.

6 In contrast to effectiveness, efficiency means that "the formulation of a policy reflects an understanding of a common good which is shared by both policy makers and their addressees" (ibid.).

7 For an example of shirking, see Chen, Xuelian, and Schubert 2024.

8 Landry 2008.

9 Lieberthal 1992; Montinola, Qian and Weingast 1995.

10 Goodman 2023, 24.

11 Edin 2003.

12 Montinola, Qian and Weingast 1995.

13 Zhou, Di 2020.

14 Zhou, Xueguang 2022.

local cadres have adapted to centrally steered political and policy systems that institutionalize organizational paradoxes,[15] manifesting in positive forms such as compliance and innovation, as well as negative forms such as resistance and involution.[16] The dynamic central–local interplay has generated a productive tension,[17] enabling policy experimentation[18] but also leading to the dilution, distortion or disregard of central directives.

Deviations in policy implementation arising from disagreements between central expectations and local preferences remain one of the most intractable pitfalls of the Chinese policy process. The Xi administration's prescribed remedy has been to curtail local discretion through top-level design. Despite this significant shift towards centralization in policy processes,[19] whether the state's steering effectiveness and efficiency have been substantially enhanced remains a matter of scholarly debate. Some analyses reveal a deeper embedding of central policies within local governance, intensified by anti-corruption and ideological campaigns that foster unpredictability and risk.[20] This compels local authorities to comply with central directives despite challenges, as the political risk of disregarding direct policy commands is greater than the risk of the implementation challenges themselves.[21] While top-down control has enhanced the state's capacity to mobilize localities for nationally significant policy goals, especially during emergencies, reduced local flexibility has led to a loss of policy adaptability.[22] What is even more concerning is that top-level design has yet to improve the implementation of many previously underperforming policies[23] or to prevent local deviations from central intentions.[24] This is also evident in the field of environmental governance.[25]

Environmental governance exemplifies central–local priority deviations, namely – environmental protection versus economic growth[26] – making it an ideal context for assessing the effectiveness of top-level design in improving policy implementation. China is often cited as an example of authoritarian environmentalism, a mode of governance aimed at achieving environmental goals through state-led command-and-control while restricting public participation.[27] Different strands of scholarship recognize that China has moved towards more plural forms of environmental regulation,[28] as evidenced by the progression of peripheral actors into established players through defined channels.[29] Summing up these perspectives, it can be argued that while the authorities may, under certain conditions, support social or corporate actors in advancing environmental goals, the central government's primary focus on improving environmental governance continues to be strengthening command-and-control mechanisms. This longstanding tendency has intensified under Xi.[30]

The party-state's environmental *command* has operated by embedding environmental targets into the annual performance evaluations of local cadres. Since 2006, a series of strengthening measures has transformed environmental policies from soft goals into stringent mandates, elevating the prominence of environmental issues on local policy agendas and achieving success in addressing "first-generation problems," characterized by easily identifiable and verifiable pollution sources.[31]

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15 Zhou, Xueguang 2010.
16 Teets and Hurst 2014, 175.
17 Goodman 1994, 15.
18 Heilmann 2008, 23.
19 Ahlers and Stepan 2016, 34; Ahlers and Schubert 2022.
20 Minzner 2018, 29; Tsai and Wang 2019.
21 Heffer and Schubert 2023.
22 Habich- Sobiegalla, Zheng and Pluemmer 2025, 13.
23 Gu and Page-Jarrett 2018.
24 Ergenc 2022.
25 Kostka and Nahm 2017, 575–78.
26 Marks 2010; Ran 2013; Lo 2015.
27 Beeson 2018.
28 van Rooij, Stern and Fürst 2016.
29 Chu 2023.
30 Shapiro and Li 2020, 203; Kostka and Zhang 2018, 772.
31 Kostka 2016, 58.

However, more complex environmental challenges, such as those requiring intricate metrics, multi-sectoral coordination and cross-regional collaboration, reveal a significant gap between policy objectives and outcomes. Ambitious central targets lack sufficient oversight during implementation, resulting in a state of command without control.[32]

In response, the Xi-led leadership strengthened central *control* through vertical administrative management in 2016 and upgraded the Ministry of Environmental Protection to the Ministry of Ecology and Environment (MEE) in 2018. These reforms separated local environmental agencies from local governments, transforming them into vertically dispatched agencies and strengthening the overall administrative status of the environmental sector. Financial and personnel decisions were transferred to higher-level environmental departments rather than to local governments at the same administrative level. Despite increased autonomy, local environmental departments have become alienated from other segments of the local bureaucracy, weakening their ability to engage in cross-sectoral cooperation.[33] In addition, the centralization of financial authority, particularly through special transfers to align local budget allocations with central policy priorities, addresses funding shortfalls for local environmental enforcement. However, local dependency on central funding can undermine the commitment to achieving environmental goals, especially when these goals conflict with economic growth and stability objectives. Moreover, disparities in fund utilization among local governments have led to inefficiencies and waste, further reducing the overall effectiveness of central funding.[34]

Campaign-style governance is another tool for strengthening central control, targeting the most severe pollution problems and breaking local protectionism through intense political mobilization and direct central inspections, as exemplified by the air pollution campaigns of the 2010s. On the one hand, such "blunt force regulation" has yielded some commendable results; on the other hand, it is often accompanied by the side effect of local over-enforcement, severely damaging livelihoods and undermining policy legitimacy.[35] Another concern is that the political mobilization and central supervision involved in such campaigns are costly for both central and local governments, rendering the approach unsustainable.[36] Reliance on temporary campaigns may impede the development of routine implementation mechanisms.[37] In response to criticisms of campaign-style governance, some observers argue that central inspections have been institutionalized under Xi and have evolved into semi-permanent control mechanisms.[38] In certain cases, they appear to have transcended their original role of monitoring policy implementation, serving instead as a channel for central–local communication that enables consensus building and policy adjustment in response to local feedback.[39] Whether these more successful cases represent a broader institutional trend, however, remains contested.

"Strengthened authoritarian environmentalism" has become central to Xi-era ecological civilization, reflecting the broader trend of centralizing policy processes.[40] Nevertheless, most scholarly observations suggest that Xi's policy processes – not only in environmental governance but across sectors – continue to mirror systemic features of the Hu–Wen era,[41] achieving implementation that is effective[42] yet selective.[43] While existing concepts based on empirical data from the pre-Xi era

32 Ibid., 63.
33 Kostka and Zhang 2018, 772–73.
34 Wong and Karplus 2017, 679–680.
35 Ran 2024.
36 van der Kamp 2023.
37 van Rooij et al. 2017.
38 Chen, Guiwu 2022.
39 Wang, He and Liu 2023.
40 Lo 2020.
41 Ahlers and Schubert 2022.
42 Ahlers and Schubert 2015.
43 O'Brien and Li 1999.

remain relevant, many require a degree of recalibration to better theorize around changes to policy processes in Xi's China. For instance, although existing research has extensively explained why local authorities ignore or distort certain policies, far less attention has been paid to how they evade policy responsibilities in their daily operations and hedge against pressure from the centre. This study aims to fill this research gap by examining the eco-transformation of MSW management, a long-standing environmental issue that has undergone several waves of centralized policy campaigns, which have yielded limited results.

Chinese ENGOs frequently express bewilderment over the persistent failures of nationwide MSW separation initiatives, the intended starting point for greener MSW management. When properly designed, waste separation could benefit all stakeholders. Unlike environmental regulations that threaten local economic interests, such as industrial pollution control, waste separation should, in theory, encounter less public resistance and less bureaucratic obstruction. It imposes no additional taxes and merely requires residents to sort waste with minor additional effort. For local governments, the financial burden is minimal and is largely confined to the placement of extra bins once public cooperation is secured. Effective sorting can significantly boost recycling and biological processing, thereby reducing the overall volume of MSW destined for landfill or incineration, both of which are major sources of environmental harm, particularly due to the high pollutant potential of plastics. Moreover, removing high-moisture organic waste from the residual stream is critical for improving the energy efficiency of waste-to-energy facilities, which operate more effectively with drier input. For local governments, reducing dependence on landfill and incinerator expansions, which are often politically contentious issues owing to urban land scarcity and environmental concerns, can also lower the risk of public protests. Overall, the long-term benefits of effective implementation were expected to outweigh the associated costs.

However, despite its apparent feasibility, MSW eco-management implementation has encountered significant resistance. During the Jiang and Hu administrations, the central government encouraged the promotion of MSW separation; however, local authorities, faced with public indifference, lacked the incentive to cultivate sustainable practices among residents. A turning point came with Xi's personal endorsement of MSW separation, symbolized by his 2018 visit to a pilot community in Shanghai. His support triggered high-profile enforcement campaigns in cities such as Shanghai and garnered national attention. Yet, in most other pilot cities, progress remained slow. Beyond sporadic, politically driven campaigns that were initiated in response to central pressure, most local governments remained inactive and avoided sustained enforcement efforts against non-cooperative residents. Resident non-compliance undermined the efforts of rule-abiding participants and disillusioned early adopters, many of whom rapidly abandoned waste-sorting practices. This persistent stagnation raises a critical question: why has a policy, which in principle involves no fundamental divergence between central and local preferences and has met with seemingly low resistance, continued to falter even under Xi's sweeping centralization and increasingly consolidated authoritarian rule?

Central Steering from Soft to Hard Mode

The earliest policy experiments promoting MSW separation for environmental purposes began in 2000 when the former Ministry of Construction, now the Ministry of Housing and Urban-Rural Development (MHURD), issued a 262-character directive to local BUALEs and sanitation departments in eight pilot cities.[44] The brevity of this directive reflected the central government's soft-steering mode: it merely required local authorities to draft their own implementation plans in line with the "spirit of the work symposium memorandum." Yet the memorandum itself – attached

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44 "Guanyu gongbu shenghuo laji fenlei shouji shidian chengshi de tongzhi" (Jianchengbu [2000] No.12), (Notification of pilot cities for waste separation), June 2000, https://www.pkulaw.com/chl/5050233fabfb7014bdfb.html?way=listView.

as an appendix to the directive – provided little substantive guidance, stating that "MSW should be progressively managed through separated processing," and assigning responsibility to local departments to formulate "specific measures" based on "national standards and local conditions," with a target recovery rate of 15 per cent. The referenced "national standards" were not issued until three years later, and even then were published by different central agencies, serving as advisory materials rather than mandatory regulations and subject to frequent revisions.[45] Key elements, including the precise definition of "separated processing" and the methodology for calculating the recovery rate, were never clearly specified. Likewise, central directives repeatedly urged localities to "take action as soon as possible," yet no clear deadlines were ever provided. Under this typical soft-steering model, the decade-long policy experiment concluded with none of the designated pilot cities achieving the 15 per cent recovery target, a benchmark that faded from central documents over the course of the policy experiment.

In 2015, MSW separation was reintroduced to the central agenda when the "Integrated reform plan for promoting ecological progress" identified "resource recycling" as a key goal.[46] This was further reinforced by Xi during the 14th meeting of the Central Leading Group for Financial and Economic Affairs. In 2017 and 2018, the State Council issued the "Implementation plan for MSW separation system" (*Shenghuo laji fenlei zhidu shishi fang'an* 生活垃圾分类制度实施方案), closely followed by the "Waste-free city construction pilot work plan," which aimed to achieve a broader ecological transformation of MSW management.[47] A total of 46 cities were designated as pilot sites for MSW separation. These cities were required to establish a comprehensive system of laws, regulations and standards at the institutional level, with a target of achieving a recovery rate of at least 35 per cent by the end of 2020.

Unlike the MSW eco-management policy experiment of the 2000s, which was steered within the vertical system of MHURD and the BUALEs, policy initiatives under Xi have been conducted through a multi-ministerial collaboration led by MHURD and MEE at both central and local levels. The overall policy plan is issued by the State Council to local governments, while more specific execution guidelines are co-drafted by MHURD, MEE and other relevant ministries, and subsequently delivered to local authorities to ensure coordination across all involved departments. For instance, the 2020 "Opinions on further strengthening the work of MSW separation," which was co-drafted by 12 central ministries, outlined policy tasks involving 25 ministry-level agencies and required local governments to align departmental responsibilities with central-level assignments.[48] At the same time, the central government clearly distinguished the roles of provincial and prefecture governments to ensure a structured implementation process.[49]

Since 2017, a series of policy guidance documents issued by Beijing has delineated policy tasks with unprecedented granularity down to the community level, encompassing measures such as "eliminating dispersed trash bins," "establishing enclosed waste-collection stations," and "scheduled

45 For a full list of relevant central documents, see the online supplementary material, "Overview of MSW-related central documents.png," in the *Zenodo* repository (see Fn. 2).

46 "Zhonggong zhongyang guowuyuan yinfa 'Shengtai wenming tizhi gaige zongti fang'an" (The Central Committee of the CCP and State Council issued the "Overall plan for reform of the ecological civilization system"). www.gov.cn, 21 September 2015, https://www.gov.cn/gongbao/content/2015/content_2941157.htm.

47 "Guowuyuan bangongting guanyu yinfa 'Wufei chengshi' jianshe shidian gongzuo fang'an de tongzhi" (Notice from the General Office of the State Council on the issuance of the pilot work plan for the construction of "waste-free cities"). www.gov.cn, 29 December 2018, https://www.gov.cn/zhengce/content/2019-01/21/content_5359620.htm.

48 "Zhufang he chengxiang jianshe bu deng bumen yinfa 'Guanyu jinyibu tuijin shenghuo laji fenlei gongzuo de ruogan yijian' de tongzhi" (MHURD and other departments issue notice on "Opinions on further strengthening the work of MSW separation"). www.gov.cn, 27 November 2011, https://www.gov.cn/zhengce/zhengceku/2020-12/05/content_5567136.htm.

49 See "Policy tasks and responsibility division according to the opinion No. 93.png" in the *Zenodo* repository for details (see Fn. 2).

waste disposal under supervision." Concurrently, these policy tasks are underpinned by phased and overarching targets, which require local governments to implement them in alignment with centrally prescribed timelines and standards. Significantly, for the first time, MSW eco-management was integrated into the evaluation system. Between 2018 and 2021, MHURD and MEE issued and updated a series of guidelines on assessment measures that outlined the general framework, evaluation criteria, indicator systems and calculation formulas provinces and prefectures were required to follow for local policy evaluation.[50] To monitor implementation, pilot cities were also required to submit monthly and quarterly reports detailing assessment results and policy progress.

Xi exerted further political pressure through direct interventions, such as visiting a pilot community for waste separation during his November 2018 trip to Shanghai and promoting recycling as "a hallmark of social civilization." His endorsement, which was prominently featured as headline news by major media outlets, Xinhua News Agency and CCTV's *News Broadcast*, significantly accelerated progress, particularly in Shanghai. In January 2019, Shanghai enacted legislation on MSW management, announcing the enforcement of mandatory MSW separation starting from 1 July, which was hailed as the "strictest waste separation in history."[51] The phrase "What kind of trash is this?" quickly became a top search query, with related topics dominating trending lists on major Chinese social media platforms.

Despite progress in a few cities, including Shanghai, nationwide progress on MSW segregation remains limited. As of 2024, some pilot cities, such as City T, have yet to finalize local legislation, relying instead on executive orders, while formal legislation has been repeatedly delayed.[52] In terms of actual policy outcomes, although no official data on MSW separation are available, an analysis of MSW treatment data suggests that there has been no significant increase in bio-treatment ratios, while incineration continues to grow rapidly (see Figure 1). This indicates that the targeted 35 per cent recovery rate, which was defined by MEE in 2019 as referring only to recycling and biological treatment, has not been achieved. Field observations in City T and City N, along with their MSW treatment data, reveal a similar (lack of) policy progress. As shown in Figure 2, the sustained increase in total MSW treatment volumes in City T indicates that recycling has not been effective in reducing overall treatment of MSW, whereas in City N, a slight decline suggests some progress in recyclable waste sorting. However, low bio-treatment ratios in both cities indicate the poor separation of kitchen waste.

Compromised Mid-level Hard Steering (Prefecture)

Despite the lack of substantive policy progress, the prefectural government of City T, as a steering subject, has indeed replicated the central hard-steering mode, at least ostensibly, to mobilize lower-level governments. In 2019, the Leading Group for MSW Separation was established at the prefectural level in City T, with the mayor serving as its head. This group formulates new policy implementation plans every May as one of its main steering tools. These plans, aligned with the latest central guidelines, have gradually expanded the scope of MSW separation, from public institutions to

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50 "Chengshi shenghuo laji fenlei gongzuo kaohe zanxing banfa" (Provisional measures for the assessment of MSW separation). MHURD internal document 2018; "Wufei chengshi jianshe zhibiao tixi shixing" (Waste-free city construction trial indicator system). MEE, 2019, https://www.mee.gov.cn/xxgk2018/xxgk/xxgk06/201905/t20190513_702598.html; "Guanyu yinfa 'shengji tongchou tuijin shenghuo laji fenlei gongzuo pinggu banfa' he 'chengshi shenghuo laji fenlei gongzuo pinggu banfa' de tongzhi" (Notice on the issuance of the "Evaluation methods for provincial-level coordination of the promotion of MSW separation" and the "Assessment measure for MSW separation"). MHURD internal document, 2021.

51 See "Laji fenlei ying lai 'shishang zuiyan,' zhe xie jiaodian ni yingdang zhidao" (Garbage sorting now the "the strictest in history": these are the points you should know). *Xinhua*, 28 June 2019, http://www.xinhuanet.com/politics/2019-06/28/c_1124683583.htm.

52 "Implementation opinions on further promoting MSW separation in City T" ([City T] guanyu jinyibu tuidong shenghuo laji fenlei gongzuo de shishi yijian), issued in 2021.
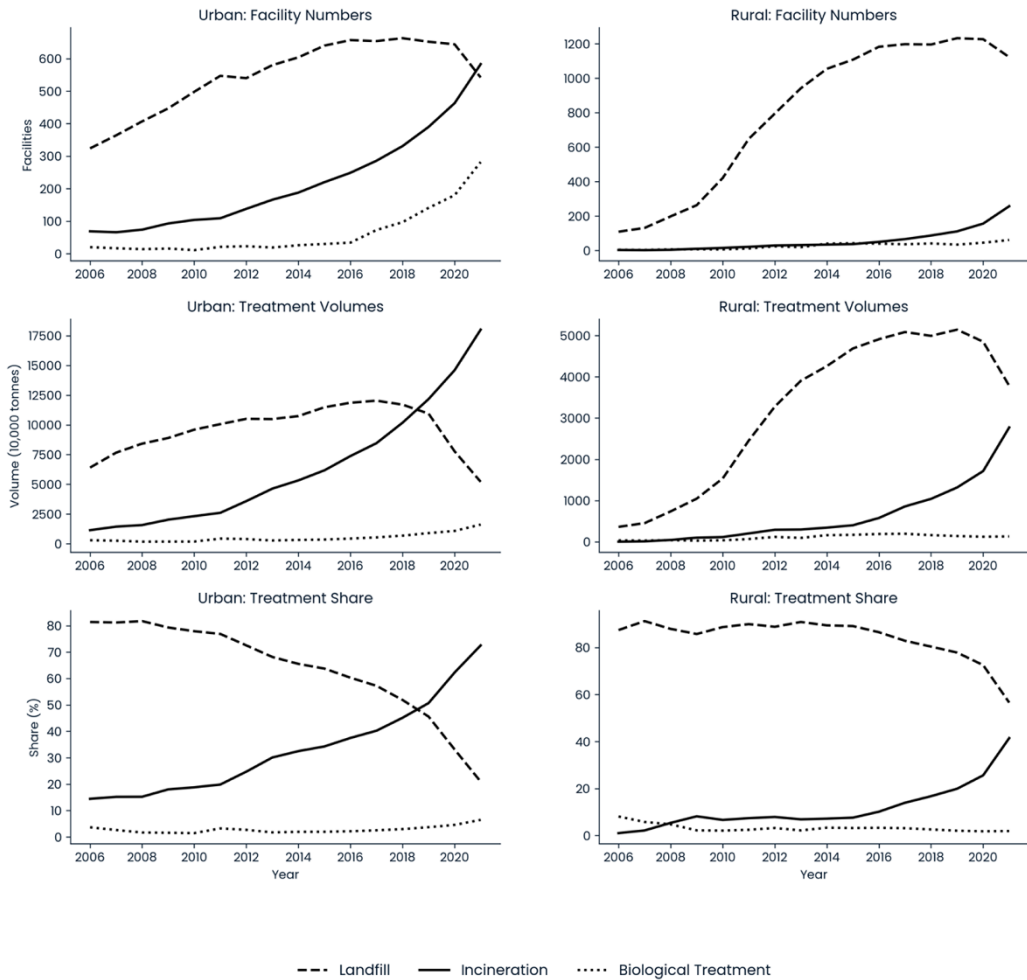
Figure 1. Trends in MSW Treatment
Source: Ministry of Housing and Urban–Rural Development 2006–2021.

residential communities, and from basic distinctions between recyclable and non-recyclable waste to more detailed wet–dry separation. Another key steering instrument, the evaluation system, has undergone regular updates and adjustments in line with the latest central guidelines. An analysis of the four versions of the "MSW separation assessment measures" ([City T] *shenghuo laji fen-lei gongzuo kaohe banfa* T市生活垃圾分类工作考核办法) issued between 2018 and 2023 shows a steady decrease in optional tasks, culminating in the full mandating of all tasks. Additionally, assessment indicators, weightings and calculation methods have been revised as required. For instance, the proportion of administrative tasks has gradually decreased each year, with greater emphasis placed on actual on-the-ground implementation.[53]

Despite its well-structured design, the hard-steering mode remains unproductive owing to the gap between the apparent rigour of the assessment and the prefecture's compromised implementation,

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53 Visualized analyses of the four versions of the MSW separation assessment measures, issued by City T's prefectural government, are available in "Percentage distribution of primary indicators over the years.png," "Distribution of administrative operations indicators over the years.png" and "Actual performance vs. infrastructure and personnel allocation.png," all of which can be found in the *Zenodo* repository (see Fn. 2).
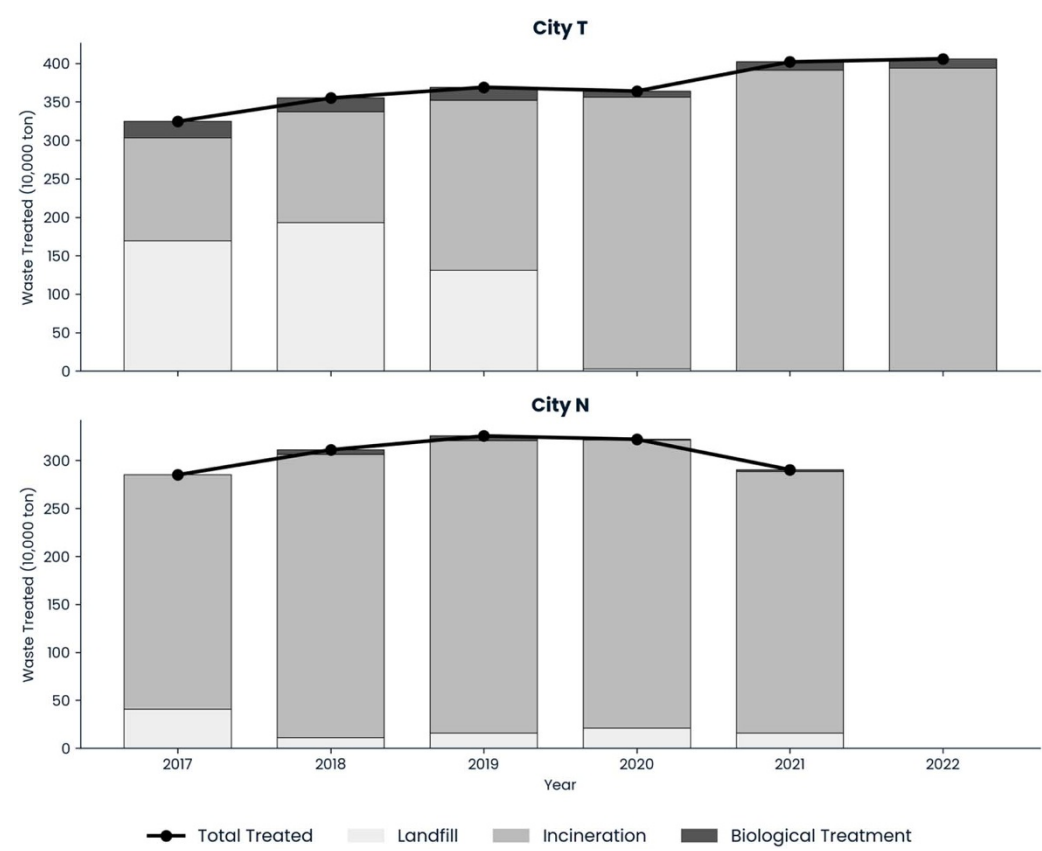
Figure 2. MSW Treatment in City T and City N
Source: Public information requests submitted to the BUALEs of City T and City N, MSW treatment statistics (2017–2022).

which is characterized by self-imposed constraints, vague performance metrics and lax inspections. For example, although a greater weighting has been assigned to on-the-ground implementation, the increased points are often awarded for infrastructure development rather than for the actual outcomes of waste separation. Waste separation scores are capped at less than 40 per cent. According to the latest "Assessment measures," subdistricts can achieve the 60 per cent threshold by merely completing infrastructure investments and administrative tasks. In a separate set of selection criteria for demonstration communities, set out in the 2022 "Demonstration community selection criteria" ([City T] *shenghuo laji fenlei shifan shequ xuanba banfa* T市生活垃圾分类示范社区选拔办法), a total of 80 points is required for selection. However, only 15 points are based on the actual waste separation performance of residents, with the remaining points mainly reflecting infrastructure and administrative compliance.

Even those indicators that seem to relate to actual separation might not withstand scrutiny. For example, the separation coverage rate ostensibly measures residents' participation in waste sorting but primarily tracks infrastructure distribution. Furthermore, to claim a 100 per cent coverage rate, a prefecture needs only one community per district to be equipped with MSW sorting infrastructure and related policy promotion materials. For a district to achieve this rate, each of its subdistricts must contain at least one such community. At the subdistrict level, a 100 per cent coverage rate requires that all communities be fully equipped. By evaluating the coverage rate only at the district level, rather than at the subdistrict level, City T's assessment results appear to show a 100 per cent coverage rate. However, in reality, few communities have achieved proper separation or are even

equipped with separation infrastructure. Another example is the evaluation criterion that "a special recycling fund must be established." The list of expenditures meeting this criterion not only includes a series of projects directly related to recycling but also incorporates treatment fees. This budget, which is traditionally allocated at the district level for incineration-focused treatment fees, implies that new, broader investments in recycling were sidestepped as it was sufficient to merely reclassify existing treatment fees.

The credibility of the evaluation system's inspections is also undermined by the fact that only a small portion of inspections are directly organized by the prefectural government. In most cases, the districts being reviewed take charge of arranging and coordinating the schedules and content, with the prefectural BUALE invited as an observer. Even for the few inspections led by the prefectural government, visits are scheduled in advance, with detailed notifications sent regarding the timing and procedures.[54] Rather than ensuring consistent compliance among grassroots units, such warnings provide a clear roadmap that encourages last-minute, makeshift solutions, thereby diluting the very purpose of inspections and allowing units to get by with temporary fixes.

Even underperformance faces negligible consequences. According to the 2019 assessment measures, the two lowest-ranked districts/counties were merely required to perform self-criticisms at prefecture-level work meetings. Since the 2021 assessment measures were issued, this token disciplinary measure has been modified. Districts/counties ranking last in two successive assessments must provide reports to the prefectural government. Remaining at the bottom for three consecutive evaluations results in a discussion with the district/county leader. However, records provided by City T's prefectural bureau for 2021 and 2022 show that no district has consistently ranked last, suggesting a rotational agreement between the lower echelons outside the top three districts.

The compromised hard-steering mode at the local level appears to comply with central directives; however, in practice, it either deviates from original policy intentions or dilutes steering intensity. This creates strategic gaps that allow grassroots governments to develop evasive adaptations in policy implementation, allowing them to avoid thorough policy engagement while maintaining the appearance of responding to high-intensity political pressure.

Governability of the Grassroots Governments

Grassroots governments perceive that institutional design allows for considerable flexibility in implementation. Loopholes in the evaluation criteria and lax enforcement of inspections suggest that MSW separation can be selectively implemented. This perception is reinforced by the marginal position of MSW separation within City T's evaluation system: although it is included in the "Comprehensive evaluation system for economic and social development" ([City T] *jingji shehui fazhan zonghe kaohe shishi xize* T市经济社会发展综合考核实施细则), it only accounts for 2 per cent of the total evaluation for district-level BUALEs and subdistrict-level governments.[55] Political discourse, however, signals rigidity and urgency: Xi Jinping has personally endorsed the MSW separation policy. This was made explicit at the City T 2021 MSW Separation Work Conference, where the mayor emphasized that "Waste separation has entered a new phase; we must accurately grasp the developing dynamics, persist with dedication, and earnestly wage an intensive and sustained campaign for waste separation … We must be aware that the central Party's stance on promoting waste separation is unyielding. We have no excuse to falter in our continued efforts."[56]

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54 The 2020, 2021 and 2022 versions of the MSW separation implementation assessment all follow the same inspection arrangement practices. This is further evidenced by the quarterly inspection reports published by the prefectural BUALE on its official MSW separation WeChat account. Findings from interviews conducted between February and April 2019 with the prefectural BUALE of City T, two district-level BUALEs, and interviews in two cities and three subdistrict offices, as well as follow-up visits in December 2020, 2021 and 2022, confirm this.

55 See "BUALE-related assessments in City T's comprehensive evaluation system.pdf" in the *Zenodo* repository for details (see Fn. 2).

56 Excerpt from the mayor's prepared speech at the City T MSW Separation Work Conference, January 2021.

In response to this regulatory slack and political rigidity, grassroots cadres commonly adopt avoidance strategies that allow them to adjust their actions in line with fluctuating policy pressures, thereby sidestepping genuine policy efforts and mitigating possible repercussions, an approach this paper terms "minimum compliance." This strategy first involves bargaining, and then moves on to leveraging available social resources, which is effective in a few cases but more commonly used for shirking implementation and coping with political pressure. When additional resources cannot be found, grassroots governments manipulate the evaluation system through gaming, redirecting and even fabricating data.

Bargaining

Local officials differentiate between supplementary "icing on the cake" (*jinshang tianhua* 锦上添花) and essential "charcoal in the snow" (*xuezhong songtan* 雪中送炭) policies.[57] MSW eco-management is categorized as negotiable and viewed as a "higher-level pursuit" that is dependent on available resources, rather than something to be pursued at all costs.[58] For policies labelled as negotiable, grassroots cadres prioritize bargaining with upper levels over assessment content, standards and inspection methods to secure lower passmark thresholds. Typically, higher-level authorities accept these negotiations to ensure that implementation plans and assessment measures remain grounded in practicality.

The first concern during negotiations is the assessment content. Typically, the aim is to avoid challenging tasks or to delay specific indicators. For example, a district BUALE persuaded the prefectural BUALE to postpone the separation of organic waste, opting instead to implement pilots in other districts. The district officials stressed that the district was undergoing a transitional phase, from a rural to urban area, and pointed to the difficulty of raising environmental awareness among the rural populace. They suggested instead that pilot projects should start in districts with better-educated residents.[59]

Next, grassroots bargaining focuses on lowering assessment thresholds, particularly for resource-constrained areas. Officials in these regions often argue that "passing lines cannot be set based on the performance of top students," insisting that policy targets should reflect the realities of different areas.[60] To shield themselves from impractical targets, grassroots officials commonly under-report, adapting to a cascading system of accumulated top-down pressure. As a result, cadres often report targets they expect to achieve that are lower than their actual capabilities. This is done by "cutting the number in half" and then "fluctuating it by 10 or 20 per cent" or "at most reporting 60 per cent." Officials who bore the brunt of the "toilet renovation" campaign of 2016 particularly exemplify this approach: "I was honest and reported with a 20 per cent cut, but what was handed down in the end was doubled and completely unachievable."[61]

Another approach is collective action, which can be effective but is rare unless many grassroots units fail to meet their policy obligations. When grassroots officials recognize that the challenges are widespread and believe that "the law does not penalize the masses," they "spontaneously" present their demands – either for changes to assessment indicators or extensions to deadlines – to higher authorities, typically during work meetings. One township cadre explained: "others can't complete it either; it's not just our problem … I have a count, if I don't mention it, someone else will. The county head is my former leader, so it's more appropriate for me to bring it up … no negotiation, but everyone is aware … if I bring it up, others will surely support it."[62] Aside from these rare instances,

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57   Interview with an official of a prefectural-level BUALE, January 2019.
58   Interview with an official of a county-level BUALE, January 2019.
59   Interviews with an official of a district-level BUALE, February 2019.
60   Interviews with officials of two district-level and a county-level BUALE, January and February 2019.
61   Interviews with officials of three township governments, March 2019.
62   Interviews with township officials, July 2022.

most bargaining takes place informally. Private discussions with higher-level officials are considered to be more effective for bridging the gaps between anticipated and achievable targets. Grassroots cadres believe that meetings involve "too much superficial work" and do not offer sufficient time to address all issues. Effective communication "mainly happens outside meetings" as it is "easier to speak in a restaurant than in the office," with meetings often serving only as an opportunity to announce results.[63]

Coping and shirking

When the window for bargaining closes, grassroots governments must find ways to pass the assessments. In the case of MSW eco-management, grassroots cadres often mentioned that they frequently have to manage with insufficient human and material resources, especially when promoting MSW separation within residential communities. To supplement administrative resources, they commonly mobilize societal resources, often outsourcing to specialized waste management or property management companies. Apart from a handful of effective cases, this approach is more frequently used by grassroots officials to shirk responsibilities or to cope with intensified pressure, rather than to genuinely advance policy objectives. The following cases illustrate evasive practices and compare them with the only observed case of effective implementation. This comparison shows that the incorporation of societal resources is often used as a strategy to adapt to political pressure and avoid responsibility for policy implementation, rather than to achieve positive policy outcomes.

The practice of outsourcing community recycling promotion and infrastructure construction to companies is common in both City T and City N. Typically, this involves service contracts signed by district BUALEs with the cooperation of subdistrict governments. In the experience of one company contracted with more than 40 communities across two districts in City N, most subdistrict and district authorities engage in shirking. For instance, when the contractor encountered strong resistance from residents, most subdistricts refused to provide any assistance in coordinating with residents' self-governing organizations, usually residents' committees.[64] Even when the contractor was faced with bureaucratic hurdles while fulfilling contractual tasks, which were caused by poor communication with other district-level departments and the district BUALE itself, the BUALE, as the contracting authority, often remained indifferent. Those local authorities who adopt shirking strategies to avoid direct involvement in demanding tasks have been known to deflect blame onto contracted companies when upper levels demand accountability for sluggish implementation: "They punished us to account for [them] not meeting assessment requirements," said one company manager, "to show that they had tried their best and that it was our failure to fulfil the contract. They claim to be victims."[65]

The company manager also remarked that, "when the government actively helps, it makes a difference."[66] For instance, in one subdistrict where the contractor encountered resistance from residents, the subdistrict office mediated to foster collaboration between residents' committees and the contractor, establishing an institutionalized joint working mechanism. The committees engaged in persuading residents, while the company was responsible for the construction of waste-collection stations and the daily operations of waste sorting in accordance with the consensus reached through committee mediation. Only if grassroots governments engage with the local communities can policy objectives be achieved.

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63 Interviews with officials of two township governments, a county-level BUALE and the prefectural-level BUALE in March and April 2019.

64 Regarding resistance, companies lack sufficient authority to compel residents to modify their established waste disposal habits, particularly when it comes to adhering to strict waste sorting and disposal schedules as mandated by the government. Moreover, when it involves transforming scattered trash bins into staffed waste-collection stations, the establishment of new collection stations is commonly met with "not in my backyard" resistance.

65 Interviews with company manager, August 2019.

66 Ibid.

Between working and shirking, the experience of an ENGO in City T exemplifies another approach used by grassroots governments when integrating social resources: they passively accept the proactive cooperation of social groups to cope with increasing political pressure from higher levels. Since 2019, one ENGO based in City T has successfully promoted the collection of recyclables and composting of food waste in several communities in which its members live and wished to support subdistrict and district governments in expanding this initiative. This proactive cooperation was met with indifference from grassroots governments until mid-2020 when intensified policy pressure compelled the prefecture to mandate demonstration communities in all districts, making grassroots governments more receptive to ENGO initiatives.[67] However, as the policy pressure of MSW eco-management eased owing to the impact of the COVID-19 pandemic, the cooperation between grassroots governments and the ENGO ceased.[68]

Manipulation and fabrication

When external resources are unavailable, grassroots governments manipulate evaluation systems through gaming, redirection and fabrication – tactics that are, at best, superficial adaptations to mask the essence of evasion or even deception. The "just-enough" gaming strategy became apparent when grassroots cadres inadvertently exposed documents filled with annotations on evaluation indicators. Tasks like "removal of rubbish bins, building collection stations," "waste disposal only during designated time periods," "specialist supervision at stations," and "door-to-door advocacy," marked by crosses (x) or circles (o), are in stark contrast to those with ticks ($\sqrt{}$), such as "regular meetings," "work reports" and "equipment procurement." Further inquiries revealed that tasks marked with ticks were either completed or actively progressing, while those marked with a cross or circle were set aside for "waiting and seeing," "future discussion" or "to be expedited later."[69] The tasks marked with crosses and circles are resource-intensive and complex but also pivotal for effective implementation, while the ticked-off tasks, which focus mainly on administrative procedures and preliminary preparations, are easier to implement but hardly contribute to progress. This approach could have been justified in the early stages of policy implementation in around 2019; however, the continuation of this practice through 2021 and 2022 in over a dozen subdistricts underscores a "just-enough" strategy aimed not at progressing from simpler to more challenging tasks but rather at calculating the simplest route to meeting the lowest assessment score.

When policy implementation is reduced to a mere points game, the "just-enough" gaming strategy often results in the adoption of substandard measures during the execution of policy tasks. For example, essential services like water supply are frequently omitted when constructing waste-collection stations, as non-functional hand-washing facilities are still enough to garner points in assessments. Similarly, when local governments are required to disseminate policies through media platforms, many choose to assign the task to available office staff instead of hiring media professionals. This approach allows them to score on this indicator but usually fails to achieve the expected level of public engagement. For instance, a WeChat account established in 2019 for MSW separation by a district BUALE in City T recorded a maximum readership of only 32.

Redirecting policy targets by leveraging pre-existing resources is another manipulation tactic. After 2017, the central government's new round of MSW separation initiatives placed particular emphasis on improving the separate collection of household waste, especially household kitchen waste, to enhance recovery rates. However, both City T and City N, rather than focusing on residential waste separation, concentrated on the collection of kitchen waste from commercial and institutional entities to boost overall recovery rates with less effort. This decision built on earlier

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67 Interviews with ENGO activists, April and July 2022.
68 Interviews with ENGO activists, March 2023.
69 Interviews with cadres of eight subdistricts and six counties between January and April 2019, November 2021 and September 2022.

developments: between 2010 and 2015, the central government had promoted the separate collection of non-residential biological waste, during which time the two cities established systems covering most catering businesses and institutional canteens in the main urban areas. This pre-existing infrastructure provided an administratively convenient alternative to undertaking more challenging reforms in residential areas. Another example of this kind of minimal effort can be seen when grassroots governments are tasked with providing waste-sorting instructors. Often, they assign existing community cleaners dual roles, without providing any supplementary training. During field interviews in 2019, we randomly questioned 47 sorting instructors; only six were able to accurately categorize types of waste with more than 80 per cent accuracy.

Amid an intensified anti-corruption campaign, data fabrication persists in subtler forms. In both cities, we found that many community waste-collection stations and composting centres were inexplicably clean, with no visible signs of being used. For instance, during a 2019 field visit, attempts to access a village composting centre were met with various excuses. When questioned about the centre's daily operations, township cadres initially claimed involvement but deferred to "professional personnel" when asked for specific operational details and figures. After interviewing villagers and observing the site for over a week, it became evident that the composting centre was unused except during inspections – or more accurately, staged tours – by higher authorities. A similar situation was observed in more than a third of the waste-collection stations we visited. Additionally, a company cooperating with two districts in City T disclosed how they were instructed to falsify data. When recovery rates were too low, subdistrict cadres instructed them to add excess liquids to kitchen waste, artificially boosting the weight of biological waste.

In the context of political steering theory, how effective is the MSW eco-management policy overall? In terms of implementation, the policy's objectives appear to have been sidelined, with data indicating that unsegregated incineration remains the primary waste treatment method. Effective treatment methods that significantly reduce environmental impact, such as biological treatment and recycling, are likely to continue being marginalized. Shifting investment away from incineration capacity towards expanding biological treatment and recycling carries substantial risks if public mobilization for waste separation proves ineffective. If waste separation at source is not successfully implemented, the infrastructure for biological treatment and recycling will be underutilized, while large volumes of unsorted waste will continue to rely on incineration or landfill. At the same time, reduced investment in these disposal methods may lead to capacity shortages, further exacerbating inefficiencies in the waste management system. Furthermore, the persistent over-investment in incineration undermines incentives for eco-transformation, as the development of bio-treatment and recycling could result in the underutilization of existing incineration facilities. In "build-lease-operate" public–private partnerships, investors (private or state-owned enterprises) build and operate incinerators on leased government land, profiting from electricity generation and the disposal fees paid by governments. Typically, prefectural and district BUALEs commit to minimum waste supply quotas in these contracts. However, the quotas are challenged when the proportion of biologically treated waste increases, as food waste typically accounts for more than 50 per cent of the waste.

As the department responsible for the timely disposal of waste, the BUALE has a strong incentive to prioritize risk-free incineration, in which it also has a vested interest, over uncertain recycling processes, even at the cost of undermining long-term environmental sustainability. Finally, environmental oversight is the responsibility of the BEE. Despite being designated as the overarching authority for the green transition of MSW management – as evidenced by the MEE/BEE's role as the lead agency in both the central and local Leading Groups for Waste-free City Construction – local BEEs have no direct authority over MSW management processes. Their role is limited to monitoring the environmental impact of waste transport and treatment; they have no authority over infrastructure planning related to MSW management. As a result, indiscriminate incineration remains the dominant method of waste disposal, driven by the departmental preferences of the BUALE.

Minimum Compliance

Interestingly, despite the evident stagnation in policy progress, assessment records from both cities indicate that most local government efforts have satisfied inspectors. Moreover, the top leadership has not held the MHURD or the pilot cities accountable for any lack of effective implementation. Apart from the limited central capacity, which makes it impractical to monitor every aspect of every national policy, it is striking that all levels of government, as steering objects, have at least shown minimal compliance. That is, they have met the minimum standards required to pass assessments without achieving the original policy objectives, although without really deviating from these objectives.

Minimum compliance can often be mistaken for effective implementation because it partially satisfies the standard of "checked by performance assessment and cadre evaluation procedures." However, the essential difference lies in whether "tangible results in accordance with central and upper-level guidelines have been achieved."[70] The intention behind "minimum compliance" is to evade policy effort as much as possible while adapting to the intensive hierarchical pressure of a hard-steering mode. Minimum compliance describes a form of governability characterized by local cadres' risk aversion, as they strive to satisfy higher authorities with the least possible implementation effort, even when actual implementation does not necessarily adhere to upper-level guidelines. In this sense, minimum compliance is a passive response and serves as a specific avoidance strategy within the framework of political steering theory.[71] Grassroots governments engage with upper-level steering to the extent necessary to (at least appear to) produce the desired policy outcomes. While local cadres attempt to shirk upper-level policy demands, they do not engage in counter-steering to achieve "alternative" policy implementation. Instead, through minimum compliance, they primarily focus on calibrated risk management that can yield either beneficial or detrimental outcomes with respect to the implementation of upper-level policy directives.

As our research shows, hard steering from the top is undoubtedly triggering minimum compliance on the part of the grassroots governments responsible for policy implementation. Meanwhile, within the multi-level governance structure, local intermediate levels such as prefecture governments also adopt avoidance strategies based on minimum compliance. Located between the central leadership on the one hand and their subordinates on the other, these governments perform a dual role: they are responsible for responding to higher authorities while at the same time guiding (and protecting) those below them. This arrangement is asymmetrical: compliance with top-level directives is mandatory, but their policy inclinations are often more closely aligned with the interests of subordinate grassroots governments, reflecting common local interests. Given the significantly increased political pressure and accountability risks under top-level design, steering efforts have to strike a balance between an unwavering commitment to hard steering, if only for the sake of political safety, and the formulation of strategies aimed at minimizing political effort in order to protect grassroots departmental or higher-level (regional) interests.

Thus, by zooming in on political mobilization within the framework of political steering theory, the effectiveness of hard steering at the central level is compromised in its replication at the local level. As steering subjects, mid-level governments flexibly modulate the room for manoeuvre granted to subordinates by preserving loopholes within the primary steering instrument, the evaluation system and its inspection mechanisms. As pressure mounts at the top, they tighten political control through revised evaluation indicators and increased inspections, but as the focus of their superiors shifts, enforcement intensity relaxes, since the policy is not perceived as locally beneficial. The unsustainability of top-level attention to MSW eco-management allows intermediate levels to adjust their own implementation requirements communicated to lower levels, ensuring an overall compliance standard that is politically safe for all actors involved.

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70 Ahlers and Schubert 2015, 377.
71 Schubert and Alpermann 2019, 211, Fn. 23.

Conclusion

The eco-transformation stalemate in MSW management highlights broader policy challenges that remain inadequately addressed under top-level design. Local governments perceive this policy as a "higher-level pursuit" that lacks both the incentives needed to drive proactive local engagement and the political urgency needed to sustain attention. During the Jiang and Hu eras, policies that aligned central and local interests or were deemed critical and urgent were implemented quite effectively. What has remained since Xi took power are the so-called "deep reform challenges" – the hard-to-crack "tough nuts" into which Xi's efforts to surpass the achievements of his predecessors largely fall: policies that are ambitious but not in line with the immediate priorities of local actors. The core objective of top-level design is to address these persistent challenges, with MSW eco-management as a prime example of a policy that requires overcoming entrenched local resistance and systemic inertia. Although increased political pressure has reduced resistance, this alone rarely leads to transitions to effective implementation. More often, it ensures that previously ignored policies are now at best minimally complied with. When faced with hierarchical pressure, steering objects adjust their strategies, oscillating between coping and shirking. Reduced pressure encourages shirking, while increased pressure causes a shift towards coping. This shift may slightly increase the likelihood of positive outcomes but may also lead to more gaming, redirection and even fabrication. In the few places where effective implementation has been achieved, the contribution of civil society has been crucial. The main driving force has been ENGOs, which are typically involved in composting gardens, farmland in the communities where their members live or organizing recycling-for-profit in rural communities through the collective economy. Indeed, the role of ENGOs in China's MWS management deserves further research.

In the past, excellence in key policy areas could bring tangible personal rewards, even if other policies were neglected, leading to selective implementation. Now, with top-level design becoming the new norm, more policies are subject to hard steering, each requiring substantial results to satisfy higher authorities. As a result, while the concentration of resources on a few policies with notable performance has decreased, local officials have not begun to effectively enforce previously overlooked policies. In particular, they do not consistently focus their efforts on a single policy but rather adjust their resource allocation according to the varying intensity of steering at any given time. Thus, while the central government's increased commitment to greener MSW management is acknowledged, its urgency is lower compared to other policies with similar levels of steering. The shift towards minimum compliance thus marks a change from the previous approach of local governments to ensure the effective implementation of selected policies. It reflects a shift in bureaucratic logic, from maximizing benefits to prioritizing risk aversion. Local governments have adopted a defensive posture to interpret policy signals and manage resources strategically. Where once local officials aimed to "strive for the best," the current emphasis is increasingly on "staying out of trouble."

References

Ahlers, Anna, and Gunter Schubert. 2015. "Effective policy implementation in China's local state." *Modern China* **41**, 372–405.

Ahlers, Anna, and Gunter Schubert. 2022. "Nothing new under 'top-level-design'? A review of the conceptual literature on local policymaking in China." *Issues and Studies* **58**(1), 2150017.

Ahlers, Anna, and Matthias Stepan. 2016. "Top-level design and local-level paralysis: local politics in times of political centralisation." In Sebastian Heilmann and Matthias Stepan (eds.), *China's Core Executive: Leadership Styles, Structures and Processes under Xi Jinping*. Berlin: Mercator Institute for China Studies, 34–39.

Beeson, Mark. 2018. "Coming to terms with the authoritarian alternative: the implications and motivations of China's environmental policies." *Asia and the Pacific Policy Studies* **5**, 34–46.

Chen, Guiwu. 2022. "Zhongyang shengtai huanjing baohu ducha heyi youxiao?" (Why is central environmental protection inspection effective?). *Chinese Public Administration* **5**, 119–127.

Chen, Xuelian, and Gunter Schubert. 2024. "China in the era of 'top-level design': hard steering by the central commission for comprehensively deepening reform in national policymaking." *Journal of Chinese Governance* **4**(9), 537–557.

Chu, Juan. 2023. "From peripheral actors to established players: environmental NGOs' participation through public notice-and-comment procedures and environmental public interest litigation in China." *Journal of Contemporary China* **33**(149), 790–808.

Edin, Maria. 2003. "State capacity and local agent control in China: CCP cadre management from a township perspective." *The China Quarterly* **173**, 35–52.

Ergenc, Ceren. 2022. "Local variation and central–local relations in China's pandemic management." *Journal of Asian Public Policy* **17**(3), 359–383.

Goodman, David S.G. 1994. "The politics of regionalism: economic development, conflict and negotiation." In David S.G. Goodman and Gerald Segal (eds.), *China Deconstructs: Politics, Trade and Regionalism*. London: Routledge, 1–20.

Goodman, David S.G. 2023. "Central control and local governance: the political economy of change since 1949." In Ceren Ergenc and David S.G. Goodman (eds.), *Handbook on Local Governance in China: Structures, Variations, and Innovations*. Cheltenham: Edward Elgar, 10–29.

Gu, Edward, and Imogen Page-Jarrett. 2018. "The top-level design of social health insurance reforms in China: towards universal coverage, improved benefit design, and smart payment methods." *Journal of Chinese Governance* **3**, 331–350.

Habich-Sobiegalla, Sabrina, Huan Zheng and Franziska Pluemmer. 2025. "Temporal governance and accountability costs of Beijing's digital citizen request system." *Regulation and Governance*. https://doi.org/10.1111/rego.12612.

Heffer, Abbey S., and Gunter Schubert. 2023. "Policy experimentation under pressure in contemporary China." *The China Quarterly* **253**, 35–56.

Heilmann, Sebastian. 2008. "Policy experimentation in China's economic rise." *Studies in Comparative International Development* **43**, 1–26.

Kostka, Genia. 2016. "Command without control: the case of China's environmental target system." *Regulation and Governance* **10**, 58–74.

Kostka, Genia, and Jonas Nahm. 2017. "Central–local relations: recentralization and environmental governance in China." *The China Quarterly* **231**, 567–582.

Kostka, Genia, and Chunman Zhang. 2018. "Tightening the grip: environmental governance under Xi Jinping." *Environmental Politics* **27**(5), 769–781.

Landry, Pierre. 2008. *Decentralized Authoritarianism in China: The Communist Party's Control of Local Elites in the Post-Mao Era*. Berkeley, CA: University of California Press.

Lieberthal, Kenneth. 1992. *Bureaucracy, Politics, and Decision Making in Post-Mao China*. Princeton, NJ: Princeton University Press.

Lo, Kevin. 2015. "How authoritarian is the environmental governance of China?" *Environmental Science and Policy* **54**, 152–159.

Lo, Kevin. 2020, "Ecological civilization, authoritarian environmentalism, and the eco-politics of extractive governance in China." *The Extractive Industries and Society* **7**, 1029.

Marks, Danny. 2010. "China's climate change policy process: improved but still weak and fragmented." *Journal of Contemporary China* **19**, 971–986.

Ministry of Housing and Urban-Rural Development. 2006–2021. *Zhongguo chengxiang jianshe tongji nianjian* (*China Urban-Rural Construction Statistical Yearbook*). Beijing: China Statistics Press.

Minzner, Carl. 2018. *End of an Era: How China's Authoritarian Revival Is Undermining Its Rise*. Oxford: Oxford University Press.

Montinola, Gabriella, Yingyi Qian and Barry Weingast. 1995. "Federalism, Chinese style: the political basis for economic success in China." *World Politics* **48**, 50–81.

O'Brien, Kevin J., and Lianjiang Li. 1999. "Selective policy implementation in rural China." *Comparative Politics* **31**, 167–186.

Ran, Ran. 2013. "Perverse incentive structure and policy implementation gap in China's local environmental politics." *Journal of Environmental Policy and Planning* **15**, 17–39.

Ran, Ran. 2024. "Performance without legitimacy? Examining the performance-legitimacy dilemma of China's authoritarian environmentalism model through Hebei's 'ban on coal furnace' project." *Journal of Environmental Policy and Planning* **26**(3), 311–324.

Schubert, Gunter, and Björn Alpermann. 2019. "Studying the Chinese policy process in the era of top-level design: the contribution of political steering theory." *Journal of Chinese Political Science* **24**, 199–224.

Shapiro, Judith, and Yifei Li. 2020. *China Goes Green: Coercive Environmentalism for a Troubled Planet*. Cambridge: Polity Press

Teets, Jessica, and William Hurst. 2014. *Local Governance Innovation in China: Experimentation, Diffusion and Defiance*. London: Routledge.

Tsai, Wen-Hsuan, and Zhou Wang. 2019. "Integrated fragmentation and the role of leading small groups in Chinese politics." *The China Journal* **82**, 1–22.

van der Kamp, Denise. 2023. *Clean Air at What Cost? The Rise of Blunt Force Pollution Regulation in China*. Berkeley, CA: University of California Press.

van Rooij, Benjamin, Rachel Stern and Kathinka Fürst. 2016. "The authoritarian logic of regulatory pluralism: understanding China's new environmental actors." *Regulation and Governance* **10**, 3–13.

van Rooij, Benjamin, Qiaoqiao Zhu, Li Na and Wang Qiliang. 2017. "Centralizing trends and pollution law enforcement in China." *The China Quarterly* **231**, 583–606.

Wang, Weiye, Suyuan He and Jinlong Liu. 2023. "Understanding environmental governance in China through the green shield action campaign." *Journal of Contemporary China* **33**(149), 739–754.

Wong, Christine, and Valerie Karplus. 2017. "China's war on air pollution: can existing governance structures support new ambitions?" *The China Quarterly* **231**, 662–684.

Zhou, Di. 2020. "China's environmental vertical management reform: an effective and sustainable way forward or trouble in itself?" *Laws* **9**(4), 25.

Zhou, Xueguang. 2010. "The institutional logic of collusion among local governments in China." *Modern China* **36**, 47–78.

Zhou, Xueguang. 2022. *The Logic of Governance in China: An Organizational Approach*. Cambridge: Cambridge University Press.

Victoria S. ZHOU holds a PhD from the University of Tübingen. Her research focuses on China's policy process, central–local relations and the behavioural logic of local bureaucracies under authoritarian rule.

Gunter SCHUBERT is chair professor of Greater China studies in the department of Chinese studies at the University of Tübingen. His research focuses on local governance and state–business relations in the PRC and the cross-Strait political economy.